

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
NORTHERN DIVISION**

BETTY ANN BURKS, et al.,

Plaintiffs,

v.

**EQUITY GROUP EUFAULA
DIVISION, LLC,**

Defendant.

§
§
§
§
§
§
§
§
§
§

**CIVIL ACTION NO.
2:06-cv-01081-MEF-DRB**

NOTICE OF FILING ADDITIONAL CONSENTS TO JOIN

Plaintiffs give notice of filing the attached Notices of Consent to Join executed by, MARTAROUS MAHONE, SCARLETT OHARA, SHAWANDA L. FAIR, KIMBERLY S. CHERRY, TRENTON LEFORE, KERRY L. DEVOSE, and TRAVISTON ROGERS, similarly situated employees to Plaintiffs, who likewise are or were subjected to the illegal pay practices at issue, and who wish to join the above captioned lawsuit.

Dated: March 30, 2007

Respectfully submitted,

THE COCHRAN FIRM, P.C.

/s/ Robert J. Camp
ROBERT JOSEPH CAMP

BERNARD D. NOMBERG

505 North 20th Street, Suite 825
Birmingham, Alabama 35203
(205) 930-6900-Telephone
(205) 930-6910- Facsimile

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2007, I electronically filed the above Notice with the Clerk of the District Court using CM/ECF System, which sent notification of such filing to:

Samuel A. Cherry
Attorney for Plaintiffs
scherry@cochranfirm.com

Lance Harrison Swanner
Attorney for Plaintiffs
lswanner@cochranfirm.com

Bernard D. Nomberg
Attorney for Plaintiffs
bnomberg@cochranfirm.com

Courtney Reily Pothoff
Attorney for Defendant
cpothoff@mindspring.com

Joel P. Smith, Jr.
Attorney for Defendant
joelsmith@bellsouth.net

Gary D. Fry
Howard A. Rosenthal
Malcolm S. Gould
Pelino & Lentz, P.C.
One Liberty Place, 32nd Floor
1650 Market Street
Philadelphia, PA 1910-7393
Phone: 215-246-3165
Fax: 215-665-1536
Attorney for Defendant

/s/ Robert J. Camp
ROBERT J. CAMP

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Martavous Mahone states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Equity Group, LLC at
the facility located in Bakerhill, AL. I worked at this location from
01/09/06 to 08/23/06.
[Date] [City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Equity Group, LLC plant in Bakerhill, AL and
possibly other plants owned by Equity Group, LLC. If brought as a class
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 20 day of MARCH, 2007.

MARTAVOUS MAHONE
[Signature]

Martavous Mahone
[Signature]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Scarlett O'Hara states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Equity Group, LLC at the facility located in Baker Hill, AL. I worked at this location from 1-29-07 to Present.
[Name of plant] [City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the KeyStone Feed Ephy plant in Baker Hill, AL and possibly other plants owned by KeyStone Ephy Group, LLC. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.
[Name of Plant] [City/State] [Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 31st day of March, 2007.

Scarlett O'Hara
[PRINT NAME]

Scarlett O'Hara
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Shawanda L. Fair states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Equity Group, Inc at
[Name of plant]
the facility located in Bakerhill AL. I worked at this location from
[City/State]
Sept 28, 05 to July 08, 2006.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre-and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Equity Group, Inc plant in Bakerhill AL, and
[Name of Plant] [City/State]
possibly other plants owned by Equity Group, Inc. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 17 day of March, 2007.

Shawanda L. Fair
[PRINT NAME]

Shawanda L. Fair
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Kimberly S. Cherry states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Keystone Equity Group, LLC at
[Name of plant]
the facility located in Bakerhill, AL. I worked at this location from
[City/State]
Feb. 14, 2003 to present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre-and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Keystone Equity Group, LLC plant in Bakerhill, AL, and
[Name of Plant] [City/State]
possibly other plants owned by Keystone. If brought as a class
[Name of Plant] Equity Group, LLC
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 18 day of March, 2007.

Kimberly S. Cherry
[PRINT NAME]

Kimberly Cherry
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Trenton Leflore states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Equity Group, LLC at the facility located in Bakerhill, AL. I worked at this location from 8-19-2004 to Present.
[Name of plant] [City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre-and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Equity Group, LLC plant in Bakerhill AL, and possibly other plants owned by Equity Group, LLC. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.
[Name of Plant] [City/State] [Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 31st day of March, 2007.

Trenton Leflore
[PRINT NAME]

Trenton Leflore
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

KERRY L. DEVOSE states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Keystone Equity at
[Name of plant] the facility located in BAKERHILL, AL. I worked at this location from JAN 2006 to MAY 2006.
[City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Keystone plant in BAKERHILL, AL and possibly other plants owned by Keystone. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.
[Name of Plant] [City/State] [Name of Plant] Equity Group, LLC

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 14 day of MARCH, 2007.

KERRY L. DEVOSE
[PRINT NAME]

Kerry Devose
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Travis Rogers states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Equity Group, LLC
~~KeyStone Foods~~ at
[Name of plant]
the facility located in Bake Hill AL. I worked at this location from
[City/State]
3-11-05 to 7-7-2006.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre-and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Equity Group, LLC
~~KeyStone Foods~~ plant in Bake Hill AL, and
[Name of Plant] [City/State]
possibly other plants owned by Equity Group, LLC
~~KeyStone Foods~~. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 30 day of Oct, 2006.

Travis Rogers
[PRINT NAME]

Travis Rogers
[SIGN NAME]